

## AMENDMENT AND RESPONSE

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Filing Date: April 14, 1999

Attorney Docket No. 100.113US01

Title: INTERFACE FOR AN ENTERPRISE RESOURCE PLANNING PROGRAM

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not show a parameter file for mapping data from a data file to screens of an ERP system. Furthermore, Applicant also maintains that Geller et al. does not show executing screens to provide data from the data file to an ERP system. Applicant therefore submits that Geller et al. fails to teach such an interface to an ERP system and thus does not show what is covered in claim 1.

Moreover, in response to the Examiner's specific findings of the claimed elements in Geller et al., the Applicant submits that Claim 1 teaches providing a file containing data to be loaded into the enterprise planning system ("the data file"). In contrast, the Applicant respectfully submits that Geller et al., column 4, lines 19-21 cited by the Examiner as teaching this element does not teach a file containing data to be loaded into the enterprise resource planning system. See, e.g., Geller et al., column 4, lines 11-28. The Examiner additionally maintains that Geller et al. column 8, line 24 teaches the element of data to be stored (loaded) into the enterprise planning system. Applicant respectfully disagrees and maintains that the full sentence from Geller et al. column 8, lines 24-26, "In accordance with the invention, however, data stored in the ERP database 21 can be accessed via SQL queries and incorporated as tables stored locally on the salesperson's laptop computer 12", appears to show that Geller et al. accesses data already in an ERP database and does not store data into the ERP database from another source, e.g., legacy data.

Applicant also submits that Claim 1 additionally teaches creating a file containing at least one parameter (the "parameter file"), wherein the parameter file maps data from the data file to screens of the enterprise resource planning system. The Examiner maintains that Geller et al. column 18, lines 6-7, and column 4, lines 40-46 teaches creation of such a parameter file, containing at least one parameter, wherein the parameter maps data from the data file to screen. Applicant respectfully disagrees with this characterization and maintains that the parameter explorer of Geller et al. does not

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map data from a data file to a screen of an enterprise resource planning system as called for in the claim. The Applicant therefore submits that the parameter file of Geller et al. does not teach mapping data from a data file to screens of an ERP database. *See, e.g.,* Geller et al., column 3, lines 19-64, and column 4, lines 29-58.

Furthermore, the Applicant submits that Claim 1 additionally teaches processing each record in the data file according to the parameters in the parameter file to execute screens of the enterprise resource planning system so as to provide the data from the data file to the enterprise planning system. The Examiner maintains that Geller et al., column 4, lines 40-46, teaches processing each record in the data file according to the parameters in the parameter file to execute screens. The Applicant respectfully disagrees and submits that Geller et al., column 4, lines 40-46, does not inherently include "executing" screens utilizing the parameter file and data file as claimed. *See, e.g.,* Geller et al., Figures 8, 34, 35, and 36, column 40, lines 38-64, column 4, lines 4-39, and column 41, lines 8-22, and lines 57-61.

The Examiner admits that Geller et al. does not teach processing each record. The Applicant respectfully submits that Geller et al. does not teach this element of claim 1 because it does not address the problem of loading data in to an ERP system.

The Applicant therefore submits that for the reasons given above that the rejection of claim 1, as being obvious in light of Geller et al. is improper.

Claim 13 is directed to a method for providing data to an enterprise resource planning (ERP) system that specifies opening a parameter file containing a plurality of parameters, opening an associated data file containing a plurality of records wherein the parameter file maps data from the data file to screens of the ERP system for each record in the data file, creating commands based on the plurality of parameters and executing the commands to provide data from the data file to the ERP system.

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Applicant respectfully maintains that the reference, Geller et al. does not show opening a parameter file and an associated data file, or creating commands based on the plurality of parameters for mapping data from a data file to screens of an ERP system. Furthermore, Applicant also maintains that Geller et al. does not show executing the commands to provide data from the data file to the ERP system. Applicant therefore submits that Geller et al. fails to teach such an interface to an ERP system and thus does not show what is covered in claim 13.

Furthermore, the Examiner maintains that Geller et al., ABSTRACT, lines 5-12, and column 4 lines 18-28 and teach the elements of a parameter file containing a plurality of parameters and opening an associated data file. The Examiner also maintains that these elements when taken in combination with the elements from Geller et al. already cited against of claim 1 allow a finding of obviousness for claim 13. The Applicant respectfully disagrees and submits that Geller et al., ABSTRACT, lines 5-12, and column 4 lines 18-28 cited by the Examiner as teaching this element does not teach a parameter file containing a plurality of parameters and opening an associated data file. *See, e.g.,* Geller et al., column 3, lines 19-64, and column 4, lines 11-58. In addition, Geller et al., ABSTRACT, lines 5-12, and column 4 lines 18-28 add no disclosure or teaching that allow the combination to overcome the lack in the cited art, shown above in response to the rejection of claim 1, of a recitation of all of the elements of claim 13.

The Applicant therefore submits that for the reasons given above that the rejection of claim 13, as being obvious in light of Geller et al. is improper.

Claim 20 is directed to a computer readable medium encoded with a computer program for execution by a processor to perform a method for providing data to an enterprise resource planning (ERP) system that specifies opening a parameter file containing a plurality of parameters, opening an associated data file containing a

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plurality of records wherein the parameter file maps data from the data file to screens of the ERP system for each record in the data file, creating commands based on the plurality of parameters and executing the commands to provide data from the data file to the ERP system.

Applicant respectfully maintains that the reference, Geller et al. does not show a method for providing data to an enterprise resource planning (ERP) system that specifies opening a parameter file containing a plurality of parameters, opening an associated data file containing a plurality of records wherein the parameter file maps data from the data file to screens of the ERP system for each record in the data file, creating commands based on the plurality of parameters and executing the commands to provide data from the data file to the ERP system. Furthermore, Applicant also maintains that Geller et al. does not show executing the commands to provide data from the data file to the ERP system. Applicant therefore submits that Geller et al. fails to teach such a computer readable medium or method and thus does not show what is covered in claim 20.

Furthermore, the Examiner maintains that Geller et al., ABSTRACT, lines 5-12, and column 4 lines 18-28 teach the elements of a parameter file containing a plurality of parameters and opening an associated data file. The Examiner also maintains that these elements taken in combination with the elements from Geller et al. already cited against of claim 1 allow a finding of obviousness for claim 20. The Applicant respectfully disagrees and submits, as above, that Geller et al., ABSTRACT, lines 5-12, and column 4 lines 18-28 cited by the Examiner as teaching this element does not teach a parameter file containing a plurality of parameters and opening an associated data file. *See, e.g.*, Geller et al., column 3, lines 19-64, and column 4, lines 11-58. In addition, Geller et al., ABSTRACT, lines 5-12, and column 4 lines 18-28 add no disclosure or teaching that

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allow the combination to overcome the lack in the cited art, shown above in response to the rejection of claim 1, of a recitation of all of the elements of claim 20.

The Applicant therefore submits that for the reasons given above that the rejection of claim 20 as being obvious in light of Geller et al. is improper.

As Claims 2-11, 14, 16-19, 21, and 23-26 depend directly or indirectly from and further define the patentably distinct claims 1, 13, and 20 Applicant respectfully maintains that they also are in condition for allowance.

Applicant respectfully contends that claims 1-11, 13-14, 16-21, and 23-26 as pending have been shown to be patentably distinct from the cited reference. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the rejection under 35 U.S.C. § 103(a) and allowance of claims 1-11, 13-14, 16-21, and 23-26.

35 U.S.C. §103(a) Rejection

The Examiner rejected claims 11-12, 15 and 22 under 35 U.S.C. §103(a) as being unpatentable over Geller et al. (U.S. Patent No. 5,844, 554) in view of Glowny (U.S. Patent No. 5,805,897).

As Claims 11-12, 15 and 22 depend directly or indirectly from and further define the patentably distinct claims 1, 13, and 20 Applicant respectfully maintains that they also are in condition for allowance.

Additionally, the Applicant submits that the further addition of Glowny to the rejections of claim 1, 13, and 20 add no disclosure or teaching that allow the combination to overcome the lack in the cited art of a recitation of all of the elements of the claims. As such, a *prima facie* case of obviousness has not been met with respect to

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claims 11-12, 15 and 22, and those claims are believed allowable. The Applicant also submits that as Glowny applies to remote software installation and maintenance, and not an enterprise resource planning system, it is non-analogous art and one skilled in the art would not have been motivated to incorporate it.

Applicant respectfully contends that claims 11-12, 15 and 22 as pending have been shown to be patentably distinct from the cited reference. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the rejection under 35 U.S.C. § 103(a) and allowance of claims 11-12, 15 and 22.

**REVOCATION AND POWER OF ATTORNEY AND****CERTIFICATE UNDER 37 C.F.R. §3.73(b)**

Enclosed in a Revocation, Power of Attorney and Certificate Under 37 C.F.R. §3.73(b) that has been executed on behalf of the Assignee. It is respectfully requested that this document be entered, and that all subsequent communications be sent to the Attorneys for Applicant to the address set forth in the document.

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Conclusion

Claims 1-26 are currently pending. Applicant respectfully submits that the claims are in condition for allowance and notification to that effect is earnestly requested. If the Examiner has any questions or concerns regarding this application, please contact the undersigned at (612) 312-2207.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 501373.

Respectfully submitted,

Date: 6/17/02

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